

In t he Matter of)	
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Amendment of Part 97 of the Commission’s rules)	WT Docket No. 05-
235		
To Implement WRC-03 Regulations Applicable to)	
Requirements for Operator Licences in the)	
Amateur Radio Service		

To: The Commission

Many, if not the majority of amateur licensees who regularly use Morse telegraphy, initially learned the code not because they eagerly anticipated the opportunity to become telegraphers, but because they wanted to become licensed radio amateurs, and Morse Code was a mandatory requirement. Although many amateur operators never used Morse telegraphy after passing the initial examination, others developed an interest in the art of telegraphy and have used this mode of communication over the air, in many cases for decades, thus developing a competence in Morse code far beyond the minimal licensing requirements.

As the amateur population ages, the number of capable telegraph operators will rapidly diminish if the licensing requirement is eliminated and the pool of Morse operators is not replenished, thus vastly accelerating the disappearance of Morse-capable operators among the general population. The code requirement for amateur radio is not very different from foreign language, algebra and other academic core requirements to graduate from high school or university, given that many students will never use this knowledge after they graduate while others will find the knowledge invaluable throughout their lifetime.

If the code requirement is dropped, getting new amateur operators to learn Morse will be difficult, much in the same manner as getting Americans to learn a foreign language before travelling abroad. As veteran amateur licensees die off, Morse telegraphy will eventually become a lost art.

The current Morse requirement is so minimal that it could hardly be an impediment to anyone who is seriously motivated to become a licensed radio amateur operator. Preservation of the art of Morse telegraphy for the future is a justifiable reason to maintain the current Morse code requirement for access to the amateur bands below 30 MHz.

The Extra Class licence was created to include the most highly skilled of amateur operators. The name "Extra" implies skills beyond the range of "average" or "minimal," that the holder of the licence is a member of an expert class. Morse telegraphy naturally and historically falls within this extended range of skills expected and appropriate for a radio operator considered a licensed expert in the field of radiocommunication. If this facet of expertise is removed from the top-grade amateur licence, then the integrity of the Amateur Extra Class will be substantially diminished.

In conclusion, I urge the Commission to retain the current Morse code examination requirements for amateur radio.

Respectfully submitted,

Donald B. Chester